UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

:

FRANK E. MAHONEY, :

NO. 16-14519 (MDC)

: Hearing Date: 3/9/17

Debtor. : Time: 11:00 a.m. : Courtroom #2

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

- 1. The Debtor has filed a Motion seeking an Order to Reconsider the Dismissal of the Debtor's Bankruptcy Case for the reasons stated in the attached Motion.
- 2. **YOUR RIGHTS MAY BE AFFECTED.** You should read these papers carefully and discuss them with your attorney if you have one, in this Bankruptcy case. If you do not have any attorney, you may wish to consult an attorney.
- 3. If you do **NOT** want the Court to grant the relief sought in the Motion, then, on or before **February 28, 2017**, you or your attorney must do all of the following:
 - a. File an Answer or Objection explaining your position at:

Office of the Bankruptcy Clerk, United States Bankruptcy Court, Robert N.C. Nix Building, 901 Market Street, Suite 400, Philadelphia, PA 19106.

If you mail your answer to the Bankruptcy Clerk's office, you must mail it early enough so that it will be received on the date stated above; and

b. mail a copy to the movant's attorney at:

Maggie S. Soboleski, Esquire CENTER CITY LAW OFFICES, LLC 2705 Bainbridge Street Philadelphia, PA 19146 215-620-2132 (tel) 215-977-9644 (fax)

- 4. If you or your attorney do not take the steps outlined in paragraphs 3(a) and 3(b) above, and attend the hearing the Court may enter an Order granting the relief requested in the Motion.
- 5. A hearing on the Motion is scheduled to be held before the Honorable Magdeline D. Coleman on March 9, 2017 at 11:00 a.m. in Courtroom #2, United States Bankruptcy Court, 900 Market Street, 2nd Floor, Philadelphia PA 19107. Unless the Court orders otherwise, the hearing on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed. R. Bankr. P. 9014(d).
- 6. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney identified in paragraph 3(b)
- 7. You may contact the Bankruptcy Clerk's Office at 215-408-2800 to find out whether the hearing has been cancelled because no one filed an answer or objection to the Motion.

Dated: February 8, 2017

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CERTIFICATE OF SERVICE

I, MAGGIE S. SOBOLESKI, certify that I did cause a true and correct copy of the foregoing Notice and Motion to be served via the mode indicated upon the following individuals this 8th day of February, 2017:

Denise Carlon, Esq. (via e-mail) KML Law Group, P.C. 216 Haddon Avenue, Suite 406 Westmont, NJ 08108

Mr. Frank E. Mahoney (via U.S. mail) 100 Verona Road Broomall, PA 19008

William C. Miller, Esquire (via e-mail) Chapter 13 Trustee 111 S. Independence Mall Suite 583 Philadelphia, PA 19106

CENTER CITY LAW OFFICES, LLC

By: Maggie S. Soboleski

Pa. Id. No.: 88268 2705 Bainbridge Street Philadelphia, PA 19146 Tele.: 215-620-2132

E-Mail: msoboles@yahoo.com

Attorney for the Plaintiffs

Dated: June 16, 2009